SERCARZ & RIOPELLE, LLP

810 SEVENTH AVENUE, SUITE 620

NEW YORK, NEW YORK 10019

1-212-586-4900

FACSIMILE 1-212-586-1234

www.sercarzandriopelle.com

ROLAND G. RIOPELLE
MAURICE H. SERCARZ*

---*ADMITTED IN NY & NJ

September 12, 2013

BY ECF and HAND

Hon. Laura Taylor Swain United States District Judge Southern District of New York 500 Pearl Street, Rm. 755 New York, NY 10007

> Re: <u>United States v. Bonventre, et al.</u>, S10 10 Cr. 228 (LTS)

Dear Judge Swain:

The Defendants have now reviewed the government's proposed voir dire, and I am pleased to enclose a copy of a few additional voir dire questions which the Defendants respectfully request that the Court ask prospective jurors during jury selection. This is a joint submission on behalf of all Defendants.

Please note that the Defendants reserve their right to request that the Court ask additional questions, if the Court rules that questions included in the Defendants' jointly submitted Juror Questionnaire should be deleted. Specifically, the Defendants reserve their right to request that any questions removed from the written Questionnaire be asked of the prospective jurors during the voir dire process, including questions relating to the jurors' experience as investors; their relationship with or knowledge of the financial industry; and their exposure to press reports concerning Bernard Madoff. Because we do not know whether the Court will edit the Questionnaire at this point, we are not in a

SERCARZ & RIOPELLE, LLP

position to know precisely what additional questions we might propose.

Respectfully submitted,

Roland G. Riopelle

Encls.

Cc: All Counsel (By ECF)